

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

HLADIK, ONORATO & FEDERMAN, LLP

Danielle Boyle-Ebersole, Esquire

Attorney for Movant

298 Wissahickon Avenue

North Wales, PA 19454

(215) 855-9521

Attorneys for U.S. Bank National Association, not in its  
individual capacity but solely as trustee for the RMAC  
Trust, Series 2016-CTT

In Re:

Michael J. Bond and Jennfier Ann Bond a/k/a Jennifer  
Potts Bond

Case No: 24-10493-ABA

Hearing Date: 3/27/2024 at 10:00AM

Chapter: 13

Judge: Andrew B. Altenburg

**OBJECTION TO CONFIRMATION OF THE PLAN**

Movant, U.S. Bank National Association, not in its individual capacity but solely as trustee for the RMAC Trust, Series 2016-CTT (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtors, Michael J. Bond and Jennfier Ann Bond a/k/a Jennifer Potts Bond (“Debtors”), as follows:

1. As of the bankruptcy filing date of January 18, 2024, Movant holds a secured claim against the Debtor’s property, located at: 136 Quaker Road, Pennsville, NJ 08070 (the “Property”).
2. Movant is in the process of filing a Proof of Claim by the 03/27/2024 bar date, with an estimated secured claim in the amount of \$21,481.64, and estimated pre-petition arrears in the amount of \$160.92.
3. The proposed plan fails to treat or provide for Creditor’s claim.
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 U.S.C. § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

**WHEREFORE**, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 03/20/2024

/s/ Danielle Boyle-Ebersole, Esquire  
Danielle Boyle-Ebersole, Esquire  
Attorney I.D. # 022792000  
Hladik, Onorato & Federman, LLP  
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Attorney for Movant

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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HLADIK, ONORATO & FEDERMAN, LLP Danielle Boyle-Ebersole, Esquire Attorney for Movant 298 Wissahickon Avenue North Wales, PA 19454 (215) 855-9521 <u>Attorneys for U.S. Bank National Association, not in its</u> <u>individual capacity but solely as trustee for the RMAC</u> <u>Trust, Series 2016-CTT</u>	
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### CERTIFICATION OF SERVICE

1. I, Ashley Stranix:

☐ represent the \_\_\_\_\_ in the above-captioned matter.

☒ am the secretary/paralegal for Hladik, Onorato & Federman, LLP, who represents U.S. Bank National Association, not in its individual capacity but solely as trustee for the RMAC Trust, Series 2016-CTT in the above captioned matter.

☐ am the \_\_\_\_\_ in the above case and am representing myself.

2. On March 20, 2024 I sent a copy of the following pleadings and/or documents to the parties listed below:

Objection to Confirmation of the Plan

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: March 20, 2024

/s/ Ashley Stranix  
Ashley Stranix

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Michael J. Bond Jennifer Ann Bond 136 Quaker Road Pennsville, NJ 08070	Debtors	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Erik L. Helbing, Esquire Helbing law, LLC 109 West Broad Street Tamaqua, PA 18252	Debtors' Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Andrew B. Finberg, Esquire 535 Route 38, Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)

\* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.